

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X  
JOSE HENRY GONZALEZ, Individually and on :  
Behalf of All Other Persons Similarly Situated, :

Plaintiff, :

v. :

AUTO-CHLOR SYSTEM OF NEW YORK CITY, :  
INC., and ABC CORPORATIONS #1-10, and :  
JOHN DOES #1-10, Jointly and Severally, :

Defendants. :  
----- X

ECF CASE

No.: 1:12-CV-3465 (BMC)

NOTICE OF MOTION FOR APPROVAL OF COLLECTIVE ACTION NOTICE

PLEASE TAKE NOTICE that Plaintiff Henry Gonzalez, on behalf of himself and all others similarly situated, by his undersigned attorneys, hereby moves for the following relief in this Fair Labor Standards Act ("FLSA") collective action: (1) Conditional certification of this action as a representative collective action under the FLSA, 29 U.S.C. § 216(b); (2) Court facilitated notice of this FLSA action to the Class Members that includes a consent form as the FLSA authorizes; (3) approval of the proposed FLSA notice of this action and the consent form; (4) production of names, last known mailing addresses, telephone numbers, email addresses, last four Social Security numbers, and dates of employment of all Class Members; (5) posting of the Notice, along with the consent forms at Defendant's places of work; and (6) approval of the Reminder Notice of the FLSA notice.

In support of this motion, Plaintiff Gonzalez shall rely upon the accompanying (1) Memorandum of Law, (2) Declarations of Henry Gonzalez, Richard Keating and Paul Argento, and (3) Certification of Plaintiff's counsel Douglas B. Lipsky and the Exhibits A to C.

Dated: New York, New York  
November 16, 2012

Respectfully submitted,

BRONSON LIPSKY LLP

By s/ Douglas B. Lipsky  
Douglas B. Lipsky (DL-9372)  
630 Third Avenue, Fifth Floor  
New York, New York 10017-6705  
Phone: 212.392.4772  
Fax: 212.444.1030  
dl@bronsonlipsky.com

*Attorneys for Plaintiff Gonzalez and  
the Putative Class Members*